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NORTH AMERICAN TITLE INSURANCE COMPANY

DESIGNATED LOCAL COUNSEL FOR SERVICE
PER L.R. IA 11-1(b)

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DEUTSCHE BANK NATIONAL TRUST
COMPANY,

Plaintiff,

vs.

NORTH AMERICAN TITLE INSURANCE
COMPANY,

Defendant.

Case No.: 2:22-cv-00547-GMN-BNW

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO RESPOND
TO COMPLAINT (ECF No. 1-1)**

FIRST REQUEST

COMES NOW defendant North American Title Insurance Company (“North American”) and plaintiff Deutsche Bank National Trust Company (“Deutsche Bank”), by and through their respective attorneys of record, which hereby agree and stipulate as follows:

1. On March 29, 2022, Deutsche Bank filed its complaint in the Eighth Judicial District Court for the State of Nevada;
2. On March 31, 2022, North American removed the instant case to the United States District Court for the State of Nevada (ECF No. 1);
3. North American’s response to Deutsche Bank’s complaint is currently due on April 27, 2022;
4. Counsel for North American request a 30-day extension, through and including

1 Friday, May 27, 2022, for North American to file its response to Deutsche Bank's complaint to
2 afford North American's counsel additional time to review and respond to the allegations
3 contained in the complaint.

4 5. Counsel for Deutsche Bank does not oppose the requested extension;

5 6. This is the first request for an extension made by counsel for North American,
6 which is made in good faith and not for the purposes of delay.

7 7. This stipulation is entered into without waiving any of North American's
8 objections under Fed. R. Civ. P. 12.

9 **IT IS SO STIPULATED** that North American's deadline to respond to the complaint is
10 hereby extended through and including Friday, May 27, 2022.

11 Dated: April 25, 2022

SINCLAIR BRAUN LLP

12
13 By: /s/-Kevin S. Sinclair

14 KEVIN S. SINCLAIR

Attorneys for Defendant

15 NORTH AMERICAN TITLE INSURANCE
COMPANY

16 Dated: April 25, 2022

WRIGHT FINLAY & ZAK, LLP

17
18 By: /s/-Lindsay D. Dragon

19 LINDSAY D. DRAGON

Attorneys for Plaintiff

20 DEUTSCHE BANK NATIONAL TRUST
COMPANY

21 **IT IS SO ORDERED.**

22 Dated this 28th day of April, 2022.

23
24 Brenda N. Weksler

BRENDA N. WEKSLER

UNITED STATES MAGISTRATE JUDGE